

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

NADIA BIGLARI,)	Case No. 4:22-cv-3268
)	
Plaintiff,)	
)	
v.)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME TO
UNIVERSITY OF NEBRASKA)	RESPOND TO COMPLAINT
LINCOLN, by and through its Board of)	
Regents; ERIC DODDS, in his official)	
and individual capacity;)	
CHRISTOPHER MCCUNE, in his)	
official and individual capacity,)	
)	
Defendants.)	

COMES NOW Defendant Christopher McCune, in his individual capacity, and, pursuant to Fed. R. Civ. P. 6(b)(1)(A), moves the Court for an order extending defendant's time to respond to plaintiff's complaint in this action to April 12, 2023. Defendant states the following:

1. The Defendant received the summons and complaint on or about February 18, 2023.
2. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), the current deadline for Defendant to respond to plaintiff's complaint is March 10, 2023.
3. Good cause exists for the extension required herein, as defendant requires additional time to investigate the facts of this case and prepare a response to plaintiff's complaint.
4. Defendant has not previously requested an extension of time to respond to plaintiff's complaint.
5. Plaintiff's counsel does not oppose this motion being granted.

WHEREFORE defendant requests the Court enter an order granting an extension of defendant's time to respond to plaintiff's complaint until April 12, 2023.

DATED this 6th day of March, 2023.

Respectfully submitted,

CHRISTOPHER MCCUNE, in his
individual capacity, Defendant,

By: s/ Jason W. Grams
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2023, I electronically filed the foregoing with the clerk of the court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case.

Keith Altman
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s/ Jason W. Grams
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